

RICHARD WARE LEVITT*
rlevitt@landklaw.com

NICHOLAS G. KAIZER*
nkaizer@landklaw.com

EMILY GOLUB
of counsel
emilygolublaw@gmail.com

* ADMITTED IN N.Y., FLA., AND D.C.

LEVITT & KAIZER
ATTORNEYS AT LAW
40 FULTON STREET
23rd FLOOR
NEW YORK, NEW YORK 10038-5077

TELEPHONE
(212) 480-4000

FACSIMILE
(212) 480-4444

May 1, 2019

Douglas M. Pravda
Alexander A. Solomon
David K. Kessler
Assistant U.S. Attorneys
271 Cadman Plaza East
Brooklyn, New York 11201

Re: USA v. Khusanov
17-CR-00475

Counsel:

As we anticipate pretrial motions, including motions to suppress, as well as prepare for trial, please provide us the following:

- Pursuant to Fed. R. Crim. P. 12(b)(4)(B), please designate which Rule 16 evidence you intend to offer at trial;
- Pursuant to 18 U.S.C. § 3504(a)(1), please affirm or deny the use of the following surveillance techniques, the fruits of which we contend would be inadmissible as having been obtained in violation of Mr. Khusanov's constitutional and statutory rights. In considering this request, please confirm their occurrence or non-occurrence with both state and federal law enforcement employees who have investigated this case or have otherwise had access to information regarding this case, as they may have used these or other investigative techniques but have not as yet informed you of such. Additionally, with respect to any such techniques that have been used please describe which evidence was seized pursuant to such technique so we may make appropriate motions:
 - FISA electronic and/or mechanical surveillance that intercepted Khusanov's voice, texts or other communications
 - Title III electronic and/or mechanical surveillance that intercepted Khusanov's voice, texts or other communications
 - Any other electronic or mechanical surveillance pursuant to order or warrant other than Title III or FISA
 - Warrantless electronic or mechanical surveillance that intercepted Khusanov's voice, texts or other communications

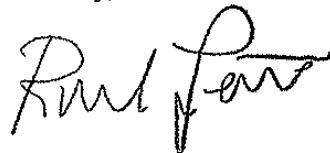
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- Warrantless entries into Mr. Khusanov's home, vehicle or other property
- Pole cameras
- Sting Ray/cell site simulators
- Tracking devices
- Any other electronic or mechanical device used with or without a warrant

Thank you.

Sincerely,



Richard Levitt